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**Go2 Systems, Inc.**

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July 1, 1999

**VIA FEDERAL EXPRESS**

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

JUL 2 1999

Re: CC Docket No. 94-102  
Go2 Systems, Inc. Comments  
On Wireless E911 Phase II Requirements

Dear Ms. Salas:

Enclosed for filing on behalf of Go2 Systems, Inc., is an original and five copies of Comments in the above-captioned proceeding.

Please date stamp the additional cover page marked "Copy" and return it to us using the enclosed self-addressed stamped envelope. You may direct any questions regarding this filing to Lee Hancock, President, Go2 Systems, Inc.

Very truly yours,

S. Lee Hancock  
President

SLH/dm

cc: Ms. Mindy Littell  
International Transcription Services

Enclosure  
(OC991820.096)

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revisions of the Commission's Rules	)	CC Docket No. 94-102
To Ensure Compatibility with	)	
Enhanced 911 Emergency Calling Systems	)	
	)	
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JUL 2 1999  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

Go2 Systems, Inc. Comment on  
Wireless E911 Phase II Automatic Location  
Identification Requirements

Go2 Systems, Inc. ("Go2 Systems") submits these comments in response to the Wireless Telecommunications Bureau (WTB) Public Notice released June 1, 1999 in the above-referenced docket (the "Notice"). A representative of Go2 Systems attended the roundtable discussions (the "Roundtable Discussions") hosted by the FCC on June 28, 1999, and these comments are based in part on some of the questions and comments of various participants in the Roundtable Discussions.

Go2 Systems supports the Commission's E911 Mandate (the "E911 Mandate") and believes that it has accelerated and will continue to accelerate the development of location determination technology designed to meet the requirements of the E911 Mandate. We note, however, that this type of location technology is currently being developed and deployed in European and other countries where the E911 Mandate does not apply, presumably because various wireless carriers and equipment manufacturers have determined that this location

technology will be commercially viable or otherwise add value to the ultimate users of wireless communications systems.

We note that many of the wireless carriers participating in the Roundtable Discussions appeared concerned about the cost of meeting the E911 Mandate and appeared to be desirous of having more time to meet the Phase II requirements of the E911 Mandate. There were also significant questions from all parties relating to the recovery of the costs associated with complying with the E911 Mandate. While the cost of complying with the E911 Mandate appears to be significant, Go2 Systems believes there are numerous other location based products, features and services which will soon be offered and available which may generate sufficient value and benefits to wireless customers. If these location based products, features and services become readily available and commercially viable, wireless carriers and equipment manufacturers will desire to quickly adopt these technologies in order to provide these products and services to meet customer demand.

With respect to handset based solutions to the E911 Mandate, location based products, features and services will soon provide market-driven incentives to encourage customers to acquire new ALI capable wireless handsets (or upgrade existing handsets) and should therefore accelerate the reduction and ultimate elimination of non-ALI legacy handsets. These products, features and services may also help to increase the wireless customers' awareness and understanding of the capabilities and limitations of the ALI features. Accordingly, Go2 Systems suggests that the FCC should consider ways of encouraging the development and deployment of commercially viable location based services by wireless carriers and equipment manufacturers. We submit that the successful deployment of E911 location

information will be quicker and more effective if wireless carriers and equipment manufacturers are motivated by the presence of commercially viable products and services which cause consumers and customers to seek such services. As such services become commercially viable, wireless carriers and equipment manufacturers will intensify their efforts to provide such services (along with accelerated compliance with the E911 Mandate) rather than being reluctant to do so and seeking ways to defer the costs associated with complying with the E911 Mandate.

With respect to the standards of reporting location information to PSAPs, we note that the FCC has required the reporting to the PSAP of the wireless E911 caller's location in latitude and longitude. There are a number of technical issues associated with latitude and longitude which have not been addressed by the E911 Mandate, including a) the existence of numerous formats which can be easily misinterpreted, mis-read, mis-communicated or erroneously input into computers and other electronic devices capable of providing map and navigation assistance and b) the existence of various datums which can cause the same latitude/longitude coordinates to refer to physical locations over 100 yards apart. Because of the complexity and the general public's unfamiliarity with certain latitude longitude formats, unsophisticated users often make errors in communicating, transcribing, and inputting typical latitude and longitude coordinates. In addition, latitude-longitude coordinates by themselves rarely, if ever, provide any meaningful information which allows the average user to intuitively determine the location or even the general area associated with a particular latitude-longitude coordinates.

In November, 1998, Go2 Systems received a United States Patent (No. 5,839,088) (the "088 Patent") on a user-friendly geographic referencing system designed to solve many of

the problems associated with traditional latitude longitude coordinates. In addition, the 088 Patent covers an integrated system of referring to commercial establishments and other locations with Internet-like addresses. The universal addresses which are the subject of the 088 Patent are designed to provide a user friendly alternative to traditional latitude-longitude coordinates and have several significant advantages over latitude longitude coordinates. The proprietary addresses which are the subject of the 088 Patent are designed to be the cornerstone of a commercially viable addressing system which, when combined with the capabilities and availability of wireless Internet access and location information, will provide significant advantages for various consumer, commercial, industrial, and governmental applications. With respect to wireless E911 applications, Go2 Systems intends to make the technology which is the subject of the 088 Patent available at very reasonable costs and is considering allowing the use of the technology on an open-source basis.

Go2 also intends to work with various other companies to develop and market various commercially viable location based products and services featuring Go2 Systems' geographic referencing system, and it is anticipated that a significant number of navigation and location based products, features and services will utilize various components of Go2 Systems' geographic referencing system. Go2 Systems is willing to structure such products and services in a way which will facilitate the use of its geographic referencing system by wireless service and equipment providers, public safety organizations, and emergency services organizations.

In conclusion, Go2 Systems supports the E911 Mandate and submits that the FCC, wireless carriers, equipment providers and others seek ways to accelerate the delivery of location technologies as well as the ability to utilize such technologies for a variety of

commercially viable products, features, and services. With respect to the technology represented by the 088 Patent, Go2 Systems intends to make such technology available to further such objectives.

Respectfully submitted,

Go2 Systems, Inc.,

By: 

S. Lee Hancock, President

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July 1, 1999

### Certificate of Service

I, Deirdre Manthey, hereby certify that on July 1, 1999, I caused to be forwarded by Federal Express for delivery on July 2, 1999 copies of these comments to the following.

International Transcription Services  
445 12th Street, S.W., Room CY-B400  
Washington, D.C. 20554

Ms. Mindy Littell  
Policy Division  
Wireless Telecommunications Bureau  
445 12th Street S.W., 3-B103  
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Deirdre Manthey